REMARKS

Claims 1, 40 and 41 stand rejected under 35 USC 112, first paragraph. Applicants respectfully traverse this rejection.

The Examiner asserts that the terms "bi-directional" and "uni-directional" connections, added to claims 1, 40 and 41 in the previous amendment, are unsupported by applicants' specification. Applicants respectfully disagree and draw the Examiner's attention to paragraphs [0051], [0055], [0058] and [0060] which disclose the recited features in such a way as to enable one of ordinary skill in the art at the time of the invention to make and/or use the invention. Accordingly, claims 1, 40 and 41 are allowable.

Claims 1-32, 34, 36, 38, 40 and 41 stand rejected under 35 USC 103(a) on Friday (U.S. Patent No. 6,631,453) in view of Kenworthy (U.S. Patent No. 6,317,837). Applicants respectfully traverse this rejection.

Applicants initially note that the Examiner has failed to particularly point out where in the cited references the features of applicants' claims are allegedly disclosed. While the Examiner does cite to portions of applicants' specification, (col. 6, lines 14-41; col. 5, lines 42-66; col. 17, lines 48-67; and col. 18, lines 1-21) the Examiner does not indicate where in these broad citations the individual features of the claims are allegedly disclosed. Accordingly, the Examiner has failed to meet his burden of providing a prima facie case of obviousness. It is not applicants' responsibility to search through the references and guess which parts of the references the Examiner is asserting as disclosing each of the claimed features.

More specifically, applicants' have previously noted that the cited references do not disclose or suggest a portable terminal as recited in claim 1. The Examiner has not addressed applicants' arguments and has failed to identify where the Examiner finds this feature in the references. Accordingly, applicants have not been afforded a fair opportunity to respond to the Action. Should the Examiner not find these remarks persuasive, applicants respectfully request a new non-final

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Action clearly identifying where in the references each of the claimed features is allegedly disclosed.

Furthermore, the Examiner has once again failed to address Fridays' teaching away from a combination with Kenworthy as repeatedly noted by applicants in previous responses. Accordingly, applicants again submit that the combination of Friday and Kenworthy is improper in light of the claimed subject matter.

Friday teaches away from the use of firewall technology as recited in claim 1. While Friday acknowledges the existence of firewall technology, stating at col. 2, lines 4-14, Friday teaches that firewalls are inadequate in modern computing to protect systems from external attacks.

Accordingly, Friday teaches a system in which firewalls <u>are not used</u>, instead disclosing the use of non-firewall based hardware and firmware to protect the system. Friday, which knew of and considered the use of firewalls to protect computer systems, consciously chose not to use a firewall based system, and instead discloses a system which replaces firewalls, thereby teaching away from the use of firewalls with the invention disclosed therein. Friday teaches a system that is to be used <u>instead</u> of firewalls, not a system to be used with firewalls, so there is no motivation in Friday to combine its teachings with a system which uses firewalls. In fact, Friday teaches away from making such a combination by stating at col. 2, lines 6-7, that firewalls actually provide "a point in the network that can be hacked by network tools." One of ordinary skill in the art reading Friday would have understood that Friday teaches that not only are firewalls inadequate to protect computer systems, but that they add a point through which the systems may be compromised. Consequently, one of ordinary skill in the art would have understood that the technology disclosed Friday was not intended to be used in addition to a firewall based system, but that it was instead intended to be used <u>in place of</u> such a system. Accordingly, one of ordinary skill in the art would find no motivation to combine Friday with a firewall based system.

Kenworthy, in contrast to Friday, discloses an internal network node having a dedicated firewall. There is nothing in Kenworthy that would have motivated one of ordinary skill in the art to combine the firewall based system disclosed therein with the non-firewall based system of Friday. The cited references teach away from each other in that one states that firewalls should not be, and are not, used and the other teaches the use of a firewall. Consequently, the combination is improper and claims 1-32, 34, 36, 38, 40 and 41 are allowable.

Consequently, even if the combination of Friday and Kenworthy were proper (which it is not), claims 1-32, 34, 36, 38, 40 and 41 would still be allowable because the combination thereof fails to disclose or suggest all of the features recited in the claims.

Claim 1 recites "An image processing method for printing images on an image printing device based on a file stored in an image data transmission device using a portable terminal, said image data transmission device connected to a first internal network provided behind a first firewall, said image printing device connected to a second internal network provided behind a second firewall, and a file server connected to an external network provided outside of said first firewall and said second firewall, comprising: said portable terminal establishing a connection with said image data transmission device via said second internal network, said second firewall, said external network, said first firewall and said first internal network, wherein establishing the connection comprises using a protocol." The Examiner asserts that these features are disclosed at col. 6, lines 14-41. Applicants respectfully disagree.

The cited passage does not disclose or suggest a portable terminal, an image printing device, an image data transmission device, or a first and second internal network as recited in claim 1. Furthermore, the cited passage also fails to disclose the recited relationships between the features.

The Examiner has made no attempt to identify which, if any, of the 31 enumerated devices shown in Fridays' Fig. 3 relate to each of the features recited in claim 1. Again, applicants are left to guess the basis of the rejection.

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Claim 1 also recites that "said image printing request identifies said stored file; said image data transmission device receiving said image printing request and preparing a print job to print images associated with said stored file in response to said image printing request; said image data transmission device establishing a connection with said file server via said first internal network, said first firewall, and said external network using a protocol which allows only uni-directional connections from the first internal network to the external network at said first firewall." The Examiner asserts that these features are disclosed at col. 5, lines 42-66. Applicants respectfully disagree.

Again, the Examiner has failed to identify what items in the cited passage could possibly be asserted to disclose the recited features of claim 1. Additionally, the cited passage is directed to allowing write access to data packets and does not make any disclosure related to uni-directional connections as recited in claim 1.

Claim 1 further recites "said image data transmission device uploading said prepared print job to said file server; said image printing device establishing a connection with said file server via said second internal network, said second firewall, and said external network using a protocol which allows only uni-directional connections from the second internal network to the external network at said second firewall; said image printing device downloading said prepared print job from said file server; and said image printing device printing images based on said downloaded print job." The Examiner asserts that these features are disclosed at col. 17, lines 48-67; and col. 18, lines 1-21. Applicants respectfully disagree.

Nothing in the cited passage is related to printing, let alone to uploading a prepared print job or printing images based on a downloaded print job.

Finally, the Examiner has conceded that Friday fails to disclose a device "which allows a first bi-directional connection between the first internal network and the external network and a second bi-directional connection between the second internal network and the external network;

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[and] said portable terminal transmitting an image printing request to said image data transmission device," as recited in claim 1, and has instead relied on Kenworthy. Applicants respectfully disagree.

While the cited portion of Kenworthy (col. 8, lines 11-15) does use the term "multi-directional access control" the term does not mean what the Examiner is asserting it means. As detailed in Kenworthy, the term means that the NADFW-MS 111 controls data packet access from multiple network connections; either accepting or discarding the data packets. Kenworthy does not disclose or suggest that the connections are bi-directional as recited in claim 1. Furthermore, Kenworthy clearly does not teach that bi-directional connections are made between internal networks and an external network.

Additionally, the Examiner has conceded that Friday does not disclose "bi-directional connections between the internal networks and the external network," but asserts that Kenworthy discloses this feature. Applicants note that Kenworthy does disclose a NADFW-MS 111 which the Examiner asserts discloses bi-directional connections; however, the NADFW-MS 111 only controls connections between the internal NAD devices 116 and not between networks such as LAN 112 and the external network 122. To the contrary, the firewall between the LAN 112 and the external network 122 is a conventional bastion firewall 120 (col. 3, lines 57-61) which allows only unidirectional communication (col. 1, lines 33-43). Accordingly, neither Friday nor Kenworthy discloses the above quoted feature.

Furthermore, nothing in the cited passage discloses "said portable terminal transmitting an image printing request to said image data transmission device," as recited in claim 1. Because Kenworthy fails to disclose making any connection between a first and a second computer, and fails to address printing images related to stored files, claim 1 is allowable.

Claim 1 is allowable due at least to the many features it recites that are not disclosed by the references, and further because of the lack of motivation to combine the references. Claims 7, 13,
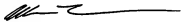
15, 17, 21, 25, 28, 32, 34, 36, 38, 40 and 41 recite similar features to those discussed above and are therefore also allowable. Claims 2-6, 8-12, 14, 16-20, 22-24, 26, 27 and 29-31 depend from allowable claims and are therefore allowable due at least to their respective dependencies.

Applicants solicit an early response allowing the claims.

In the event the U.S. Patent and Trademark Office determines that an extension and/or other relief is required, applicants petition for any required relief including extensions of time and authorize the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to **Deposit Account No. 03-1952** referencing docket no. **325772028100**.

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